

TRULINCS 54652509 - PARVIZ, MAHSA - Unit: SET-D-A

MAHSA PARVIZ
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

ANDREW GEORGE WATTERS,)
Plaintiff,)
) No. 2:23-cv-00755-RSL
v.)
) DEFENDANT'S MOTION
) TO COMPEL DOCUMENT
MAHSA PARVIZ,)
Defendant.)
) PRODUCTION



AUG 31 2023

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

BY _____ DEPUTY

COMES NOW, Defendant Mahsa Parviz, and files Defendant's Motion to Compel Document Production, seeking an order from this honorable Court directing Plaintiff to produce documents relevant to Plaintiff's claims and Defendant's pending Motion for Sanctions.

Defendant has requested the Clerk issue subpoenas in this matter pursuant to FRCP 45. Plaintiff and third-party witnesses have been served with a litigation hold notice on August 6, 2023, and at least three additional attempts to schedule inspection of files on premises and/or document production have been made within the last sixty days to Plaintiff. Plaintiff has blocked Defendant's third-party legal assistant who communicates via email on Defendant's behalf and will not respond to discovery requests.

Federal Civil Rule 45 allows parties to serve persons with subpoenas that include a "command to produce" documents. See FRCP 45(a)(1)(A)(iii), (D). Accordingly, Defendant seeks:

I. DOCUMENT PRODUCTION FROM PLAINTIFF ANDREW GEORGE WATTERS

Defendant seeks production of communication between Plaintiff Andrew George Watters and:

Defendant Mahsa Parviz; Thomas Michael Bundy; Shamsi Parviz; Bahman Parviz; Dr. Maryam Parviz; James Samuel Bell; Jenna Wrae Long; Kathrynne Nicole Seiden; Karen Blakely Turner; Blake Riad James Maso; Shelli Renee Maso; Riad Mamdouh Maso; Roger Arash Farahmand; Richard Reid Rowe; Jeremy Ian Lessem; Dr. Manuel Saint Martin; Agents of the State Bar of California (the specific communication sought is no longer privileged as Plaintiff has waived privilege by publicly discussing the matter on his website at <https://www.andrewwatters.com>); Agents of the United States Department of Justice, agents of the Federal Bureau of Prisons; Agents of the Texas Department of Insurance; Agents of the Texas Department of Family and Protective Services; Agents of the Texas Vital Statistics Unit; Agents of the President and Fellows of Harvard College; Agents of the United States Department of Health and Human Services; and any individual and/or entity contacted with regards to Defendant Mahsa Parviz and her interests.

Plaintiff has made inconsistent statements about material facts represented to this Court. Production of the foregoing is therefore necessary for a specific finding that Plaintiff has committed professional misconduct and for the Court to determine adequate sanctions to deter future sanctionable conduct. The documents sought will evidence the gravamen of Plaintiff's sanctionable conduct and show that he has willfully and deliberately made false statements to this Court with knowledge of the statements' falsity.

Production of the foregoing is also necessary to prove Plaintiff's improper purpose in filing the instant Federal suit and in support of Defendant's renewed Motion for Sanctions pending before the Court. The communication of which production is sought is limited in scope to matters relevant to Plaintiff's filings in the instant litigation, matters that relate to Defendant Mahsa Parviz and her interests only. Plaintiff has contacted the foregoing persons and/or entities for the improper purpose of obtaining information about Defendant, stalking Defendant, harassing Defendant and her family, interfering with Defendant's legal interests, disseminating false information about Defendant, and/or intentionally interfering with Defendant's business relations.

On his public website and in his First Amended Verified Complaint (Dkt. # 6), Plaintiff admits to have, inter alia, contacted Defendant's Federal prosecutors over the course of litigation of the criminal offense for which Defendant is presently incarcerated. A direct appeal is presently pending in the Ninth Circuit, Cause No. 22-50160. Plaintiff has made false representations to Defendant's Federal prosecutors and production of the foregoing necessary to support a specific finding that Plaintiff has committed professional misconduct and for the Court to justify the appropriate sanctions.

Accordingly, Defendant requests an order be issued by this Court compelling Plaintiff to produce the foregoing documents

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within a reasonable time-frame and in a reasonable manner.

Date: August 17, 2023

Respectfully submitted,

_____/s/ Mahsa Parviz
MAHSA PARVIZ

A handwritten signature in black ink, appearing to be 'MP', written over a horizontal line.

SEATTLE WA 980

NAME: Mahsa Parvaz
REG: 54052509 UNIT: DA

REG: 54652509 UNIT: DA

P.O. BOX 13900

SEATTLE, WA. 98198-1090

FILED
LODGED
RECEIVED

MAIL 29

AUG 31 2023

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

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ALFRED

BY DEPUTY
Western Dist of WA Court
Attn: Clerk (file in Cause No. 2:23-cv-00755-ASL)
700 Stewart St.
Seattle, WA 98101
98101-44999

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